

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,)	
)	Case No.: 23-CR-45
Plaintiff,)	
)	
vs.)	<u>UNRESISTED</u>
)	MOTION TO CONTINUE
REBECCA ANN ROSE,)	TRIAL, ALL TRIAL-RELATED
)	DEADLINES, AND PRETRIAL
Defendant.)	MOTIONS DEADLINE

Comes now counsel for Defendant Rebecca Ann Rose, and respectfully moves to continue the trial and all trial-related deadlines, including the pretrial motions deadline, and in support states as follows:

1. Ms. Rose was indicted on June 28, 2023, on a one count indictment charging her with possession with intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a)(1). She had an arraignment on July 25, 2023, and pleaded not guilty. Ms. Rose is currently being detained at the Linn County Correctional Center pending trial.

2. Trial is set for the two-week period beginning September 18, 2023. Trial motions are due August 31, 2023; pretrial motions are due August 22, 2023; and the deadline to file a status report or accept responsibility is August 28, 2023.

3. Counsel has recently received discovery materials and is in the process of going through them, however, the discovery is very voluminous. Additionally, while going through discovery, a conflict of interest has arisen that requires this office to withdraw from representation of Ms. Rose.

4. Assistant United States Attorney Devra Hake has indicated the government does not resist this motion.

5. No prior motion to continue has been filed.

WHEREFORE, for the foregoing reasons, Defendant Rebecca Ann Rose, through counsel, moves to continue the trial date, all trial-related deadlines and the pretrial motions deadline. Counsel respectfully requests approximately a 60-day continuance.

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CERTIFICATE OF SERVICE
I hereby certify that on August 11, 2023, I electronically filed this document with the Clerk of Court using the ECF system which will serve it on the appropriate parties.

By: /s/ Angie McClain